

EPA Reg. No. 84009-29

PROCESSING REQUEST

Reg # 84009-29 Decision # 529313

Description: NEW Registration

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated: 9/6/17

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☒ New CSF(s) Dated: 5/9/17

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Mindy Ondish

Division: Registration Division (RD)

Phone: 703-605-0723

Date: 9/14/17



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

EPA Reg. Number:

84009-29

Date of Issuance:

9/6/17

Term of Issuance:

Unconditional

Name of Pesticide Product:

Quick Acting Weed Killer Concentrate

Name and Address of Registrant (include ZIP Code):

Arianna Shorey
Agent for Ragan and Massey, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product when the Agency requires all registrants of similar products to submit such data.
2. Submit one copy of the revised final printed label for the record before you release the product for shipment.

Continued on page 2

Signature of Approving Official:

Debra Rate, Acting Product Manager 25
Herbicide Branch, Registration Division (7505P)

Date:

9/6/17

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSF:

- Basic CSF dated 05/09/2017

If you have any questions, please contact Mindy Ondish by phone at 703-605-0723, or via email at ondish.mindy@epa.gov.

Attachment

*[EDITOR's NOTE] – For use with conventional sprayers. Optional market language denoted with italicized text.
 [Note to reviewer: [Text] in brackets denotes optional text].
 [Note to reviewer: {Text} in braces denotes where in the final label text will appear.]*

{BOOKLET FRONT PANEL LANGUAGE}

Quick Acting Weed Killer Concentrate

ACTIVE INGREDIENT:

*Glyphosate, isopropylamine salt 18.00%
 **Diquat dibromide 0.73%
 OTHER INGREDIENTS: 81.27%
 TOTAL: 100.00%

*Contains 1.19 lbs (13.34%) glyphosate acid per US gallon.

**Contains 0.065 lbs diquat dibromide per US gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product call your poison control center at 1-800-222-1222.	

EPA Reg. No. 84009-29

EPA Est. No. xxxxxx-xx-xxx

NET CONTENTS: _____ qt (_____ L)

Makes up to 'X' gallons

Makes between 'X' – 'Y' gallons [X = net content/3] [Y = net contents/6]

Mix with water to make 'X' gallons of spray solution

Treats [covers] up to 'X' sq. ft area

MANUFACTURED BY:
 Ragan and Massey, Inc.
 101 Ponchatoula Parkway
 Ponchatoula, LA 70454



{LANGUAGE INSIDE BOOKLET}

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

PHYSICAL OR CHEMICAL HAZARDS

Do Not Mix Or Allow Contact With An Oxidizing Agent. A Hazardous Chemical Reaction May Occur.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

WHERE TO USE

On patios, walkways, driveways, gravel or mulch beds

Around flowers [flower beds], shrubs or trees

On driveways & walkways

Along fences

In large areas – For lawn replacement, for garden plot preparation*

*IMPORTANT: While Quick Acting Weed Killer Concentrate may be used to prepare a vegetable garden for planting, DO NOT USE for spot weed treatment after planting [any] fruits or vegetables or damage will occur.

AMOUNT TO USE

For best results:

- Add 3-6 fl. oz. [12 TBS] per gallon of water (use the higher rate for larger weeds)
- Apply on warm days in bright sunlight
- For easy to kill weeds such as [small] seedlings, add 3 fl. oz. [6 TBS] per gallon [to 1 gallon] of water

MIXING INSTRUCTIONS

Tank [Pump-Up] Sprayer:

Use a plastic, fiberglass, plastic-lined steel or stainless steel sprayer. Do not mix, store or apply in [with] a galvanized or unlined steel sprayer [container].

For tough established weeds and for best results, add [measure] 6 fl oz [12 Tbs] to [per] [1] gallon of water.

Spot treat or spray evenly over 300 sq ft.

Hose-End Sprayer:

For large areas consider using the Ortho® Dial 'n Spray® with the dial set to 4 - 6 fl. oz.

To sprayer jar add 4 - 6 fl oz [8 - 12 Tbs] for each 300 sq ft. DO NOT add water. Spray evenly over measured area.

After spraying, unused product can be poured back into its original container.

HOW TO CLEAN SPRAYER

To clean sprayer after use, rinse sprayer and all sprayer parts with water 3 times. Spray rinse water on bare soil or gravel. After cleaning, sprayer may be used for other products.

HOW IT WORKS

Quick Acting Weed Killer Concentrate is absorbed by the weed's leaves. It moves through the weed to the root, stopping the function of an essential enzyme found in plants (but not humans or animals). Weeds die, roots and all - so weeds don't grow back. Kills only what you spray. Any product not absorbed by the plant will be deactivated after it hits the soil. [Weeds usually yellow and wilt within hours with complete kill in 1 to 2 weeks.]

[ALTERNATE TEXT] Quick Acting Weed Killer Concentrate enters plants through foliage and moves systemically to the roots, killing weeds by stopping the function of a substance found in plants (but not humans or animals). Any Quick Acting Weed Killer Concentrate not absorbed by plants will be deactivated after it hits the soil. Weeds usually yellow and wilt within hours with complete kill in 1 to 2 weeks.

HOW TO SPRAY

- Spray the weeds or grasses you want to kill until thoroughly wet.
- When spot-treating weeds around desirable plants, shield plants from drift with a sheet [piece] of cardboard or plastic.
- If desirable plants are accidentally sprayed, rinse off immediately with water [or cut off treated area].

IMPORTANT: Do not spray plants or grasses you like - they will die. Do not use for spot weed control in lawns since Quick Acting Weed Killer Concentrate kills lawn grasses.

WHEN TO APPLY

Apply when weeds are actively growing. [Use anytime weeds and grasses are actively growing.]

For best [fastest visual] results, apply during warm, sunny weather (above 60° F) [to accelerate systemic movement from foliage to roots.]

Apply when air is calm to prevent drift to desirable plants.

RAINPROOF Protection: Rain or watering 30 minutes after application will NOT wash away effectiveness.

[OPTIONAL TEXT] Apply when weeds are small and before seeds form. Established [Hard to kill] weeds may require a repeat application.

APPLICATION RESTRICTIONS:

- Do not apply this product in a way that will contact any person or pet, either directly or through drift. Only the person applying this product may be in the area during application.
 - Do not [mix, store or] apply with [in] a galvanized or unlined steel [except stainless steel] sprayer.
 - Do not apply through any irrigation system.
 - DO NOT USE for spot weed treatment after planting [any] fruits or vegetables.
- Do not allow people and pets to enter treated areas until spray has dried.

WHEN TO REPLANT

All ornamental flowers, trees and shrubs may be planted 1 day after application.

Lawn grasses, herbs, vegetables [all], and fruits may be planted 3 days after application.

ADDITIONAL USES

To Kill Vines

- If vines are growing up poles, fences, or tree trunks with mature bark, cut vines to a height of 3 to 4 feet and spray vines thoroughly.
- If vines are climbing shrubs or tree trunks with green bark, cut vines at base and treat as directed for stumps or spray regrowth. If spraying regrowth, shield shrubs and tree trunks from spray drift with a sheet [piece] of cardboard or plastic.

To Kill Stumps

- Cut living stump close to ground.
- Drive [drill] 4 to 5 holes into freshly cut stump.
- Immediately pour undiluted product into holes.

IMPORTANT: Some trees may share the same root system. Adjacent trees having a similar age, height and spacing may signal a shared roots system. Injury may occur to non-treated trees when one or more trees sharing common roots are treated.

To Kill Kudzu

- For best results, apply in mid to late summer when vines are mature and actively growing.

To Kill Wild Blackberry

- Spray anytime plants are actively growing.
- Dead canes should be cut down and removed.
- Reapplication is often required to kill deep roots.

To Kill Poison Ivy & Poison Oak

- Contact with these plants anytime of the year can cause an allergic reaction.
- Spray anytime plants are actively growing, but at least 4 weeks before the first killing frost in the fall. Reapply, if new growth appears.
- Handle dead plants with rubber gloves.
- Dispose of plants and rubber gloves in tightly sealed garbage bags.

For Lawn Replacement

Use Quick Acting Weed Killer Concentrate to kill a [an old] [an unwanted] lawn and [its] weeds before planting a new lawn [OR prior to laying a patio, sidewalk, or driveway].

[ALTERNATE TEXT]

For lawn replacement use Quick Acting Weed Killer Concentrate to kill lawn and weeds before planting new lawn.

- Skip one mowing before spraying.
- Use 6 fl oz [12 Tbs] per gallon of water for each 300 sq. ft. Apply evenly over treatment area.
- If soil is dry, water before application and 2 to 3 days after application.
- If green patches remain after 7 days, reapply.
- Wait [at least] 3 days after last application to rake, till or replant with seed or sod.
- *[Alternate text] Wait [at least] 3 days for weeds and lawn to die. Repeat if necessary. Rake or till to prepare area for planting seed or sod.*

For [Flowerbed and] Garden [Plot] Preparation

- Use Quick Acting Weed Killer Concentrate to kill weeds, grasses and [brush] before planting flowers, fruits, vegetables, trees or shrubs.
- If soil is dry, water before application and 2 to 3 days after application.
- Use 6 fl oz [12 Tbs] per gallon of water for each 300 sq. ft. Apply evenly over treatment area.
- Wait 1 to 3 days after last application before planting garden. [See When to Replant section for details.]

[Optional Weed List] KILLS ALL TYPES OF WEEDS & GRASSES

Weeds [including]: Artichoke thistle, beggarweed, black medic, blue mustard, blue toadflax, brassbuttons, broadleaf plantain, burclover, buttercup, Canada thistle, cattail, chickweed, cocklebur, common groundsel, common mullein, common plantain, common ragweed, creeping beggarweed, creeping-charlie, curly dock, dandelion, dog fennel, evening primrose, false dandelion, fiddleneck, field bindweed [wild morningglory], field pennycress, filaree, Florida pusley, garden spurge, henbit, horsenettle, horseradish, horseweed/marestail, iceplant, knapweed, knotweed, lambsquarters, lantana, little bittercress, London rocket, mallow, mayweed, milkweed, mouseear chickweed, narrowleaf [buckhorn] plantain, nightshade [silverleaf], oldenlandia, oxalis, Pennsylvania smartweed, pennywort, poison hemlock, prickly lettuce, primrose, prostrate spurge, puncturevine, ragweed, red clover, redroot pigweed, shepherdspurse, smooth catsear,

smooth pigweed, sowthistle, spotted spurge, tansy ragwort, tansymustard, teaweed, trumpetcreeper, tumble mustard, Virginia creeper, white clover, whitetop, wild barley, wild mustard, wild oats, wild sweet potato, yellow starthistle, and other broadleaf weeds.

Grasses [including]: Annual bluegrass, annual ryegrass, bahiagrass, barnyardgrass, bentgrass, Bermudagrass, bromegrass, Cogongrass, crabgrass, creeping bentgrass, dallisgrass, fall panicum, fescue, field sandbur, foxtail, goosegrass, guineagrass, Johnsongrass, Kentucky bluegrass, kikuyugrass, lovegrass, maidencane, nimblewill, nutsedge, orchardgrass, pampas grass, perennial ryegrass, purple nutsedge, quackgrass, sandspur, smooth bromegrass, sprangletop, St. Augustinegrass, tall fescue, Texas panicum, Timothy, torpedograss, vaseygrass, witchgrass, yellow nutgrass, zoysia and other grassy weeds.

Brush [Tough Weeds], Unwanted Trees, Shrubs & Vines [including]: Alder, ash, [quaking] aspen, blackberry, bluegum eucalyptus, broom [French, Scotch], buckwheat, ceanothus, chamise, cherry, coyote brush, dewberry, elderberry, elm, eucalyptus, giant reed, hawthorn, hazel, honeysuckle, kudzu, locust, madrone, maple, oak, persimmon, poison oak, poison ivy, poplar, raspberry, sage, sagebrush, salmonberry, saltcedar, sassafras, sumac, sweetgum, tan oak, thimbleberry, tree tobacco, wild rose [multiflora] willow and other tough weeds.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store in original container only in a safe place away from direct sunlight.

PESTICIDE DISPOSAL: Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling, if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Ragan and Massey, Inc. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ragan and Massey, Inc. and Seller harmless for any claims relating to such factors.

Ragan and Massey, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under

conditions not reasonably foreseeable to or beyond the control of Seller or Ragan and Massey, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, RAGAN AND MASSEY, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Ragan and Massey, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF RAGAN AND MASSEY, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF RAGAN AND MASSEY, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**


Ragan and Massey, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Ragan and Massey, Inc.

APPENDIX 1 - [Ordered alphabetically] OPTIONAL MARKETING STATEMENTS


- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact, starts working immediately
- Also use for large jobs such as lawn renovation and vegetable and flower garden preparation
- Apply with tank sprayer, or a [hand held] trigger sprayer
- Approved for most [many] lawn and garden uses
- Before [weed graphics] / After [weed graphics]
- Begins absorbing on contact
- Can be used for habitat restoration, controlling exotic vegetation, and for site preparation of wildlife food plots
- Can reseed or sod lawns 7 days after treatment
- Can be used on patios, walkways, and driveways; along fences; in landscaping beds; or around flowers, shrubs and trees
- Concentrated for extra value
- Concentrated formula
- Deactivates in soil
- Does not have soil activity
- Economical
- Economical concentrate formula
- Easy to apply with an Ortho Dial 'n Spray®, hose-end, tank or [hand held] trigger sprayer
- Eliminates roots and weeds
- Fast Acting
- Fast-acting formula
- Fast-acting formula absorbs to root more quickly
- Fast-acting for visible results in 12 hours
- For control that doesn't [won't] wash away
- For weed control - kills weeds and grasses in 1 to 2 weeks - roots and all
- For Outdoor Use around the Home
- For use [with] [in] [sprayer delivery name]
- For Use on Borders, Around Patios, Driveways, and Sidewalks
- Glyphosate targets an enzyme found in plants but not in people or pets Ideal for killing unwanted weeds and grasses throughout your yard.
- Kills over 200 types of weeds and grasses, roots and all
- Kills almost all [annual and perennial] weeds, grasses and other unwanted plants
- Kills existing weeds only, no residual activity in soil
- Kills more weeds in more places.
- Kills [to] the root[s]!
- Kills [the toughest weeds and grasses] the root so weeds [they] don't come back
- Kills the roots of [both] broadleaf and grassy weeds o Kills the roots so treated weeds don't come back
- Kills the weed you see and the root you don't
- Kills the weed you see and the root others leave behind
- Kills unwanted weeds and grasses, roots and all
- Kills weeds and grasses in - Patios - Driveways - Sidewalks - Ornamental Gardens and other non-lawn areas
- Kills weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Kills weeds, roots and all
- Kills [all types of] weeds and grasses and brush
- Kills tough weeds
- Kills Weeds & [and] Grasses [down to the root]
- Kills the root
- Kills over [XXX] types of weeds
- Lawns and gardens can be reseeded or planted soon after treatment

- *Make only what you need*
- *Mix into tank sprayer*
- *Multipurpose grass and broadleaf weed control*
- *Next day [this weekend] results: Begins killing on contact, visible results in 12 hours.*
- *No odor*
- *No root. No weed. No problem*
- *Non-Selective: Kills weeds & grasses*
- *Once it enters the plant, it won't wash off*
- *One application kills over 200 types of weeds and grasses, roots and all [maximum effectiveness]*
- *Ornamental gardens can be reseeded or planted 1 day after treatment*
- *Proven [trusted] performance*
- *Provides maximum control: Kills weeds to the root so they don't ever come back*
- *Quick-action formula lets you see results fast*
- *RainFast in hours - enters the plant on contact*
- *Replant [lawn grasses, herbs, vegetables [all], and fruits] 3 days after application*
- *Same effective results even if it rains within hours*
- *Single application controls [kills] most weeds*
- *Spray weeds until thoroughly wet*
- *Starts to work immediately*
- *This Quick Acting Weed Killer Concentrate formula targets an enzyme found in plants, but not in people or pets*
- *[Use] For Brush Control*
- *[Use] For Weed Control: Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings, and in brick and gravel walkways.*
- *Use for large jobs like garden plot preparation and lawn replacement [renovation]*
- *[Use] For Lawn Renovation*
- *Use to trim and edge landscape areas.*
- *[Use] For Spot Spraying: Use in and around flowerbeds, ornamental trees, shrubs, fences, driveways and walkways*
- *[Use] For Stumps*
- *Use to prepare sites: for large plantings, for planting flowerbeds, fruit trees, ornamentals, vegetables and gardens, and for renovating lawns*
- *Use as a spot treatment along sidewalks, fences, driveways, and patios*
- *Use along fences; in cracks of walks, drives and patios; and around flower beds, trees and shrubs*
- *Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction.*
- *[Provides] Visible [see] results in [24 hours] [days]*
- *Visible Results in Hours*
- *Water based formula*
- *Weed Eliminator*
- *Weed Killer*

For California:

 **WARNING:** Cancer – www.P65Warnings.ca.gov

For California:

 **WARNING:** This product can expose you to chemicals including glyphosate, which is known to the State of California to cause cancer. For more information go to www.P65Warnings.ca.gov

EPA APPROVAL DATE

Ondish, Mindy

From: Ondish, Mindy
Sent: Tuesday, August 01, 2017 12:56 PM
To: 'Arianna Shorey'
Subject: RE: 84009-EO Product Chemistry Data Deficiencies

Thanks for the clarification. Yes, I see that they were cited in the data matrix but my eyes probably went cross and missed them.

Cross-checked source review/acceptable no

Mindy

From: Arianna Shorey [mailto:Arianna@PyxisRC.com]
Sent: Tuesday, August 01, 2017 12:19 PM
To: Ondish, Mindy <ondish.mindy@epa.gov>
Subject: RE: 84009-EO Product Chemistry Data Deficiencies

Hi Mindy,

Thanks for letting me know. For the Enforcement Analytical Method we are citing the MRID 49348101 per the Albaugh letter of authorization attached. For the Storage Stability and Corrosion Characteristics we are citing the MRID 49572701 also per Albaugh and listed on the same letter. Is there an issue with these studies? I have attached a copy of the letter for your convenience.

Thanks,

Arianna

Arianna Shorey
Pyxis Regulatory Consulting, Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332
T: (253) 853-7369
F: (253) 853-5516
E: Arianna@PyxisRC.com

From: Ondish, Mindy [mailto:ondish.mindy@epa.gov]
Sent: Tuesday, August 1, 2017 4:54 AM
To: Arianna Shorey <Arianna@PyxisRC.com>
Subject: 84009-EO Product Chemistry Data Deficiencies

Hi Arianna,

The product chemistry studies you cited for Quick Acting Weed Killer Concentrate (84009-EO) are missing the following data:

830.1800 Enforcement Analytical Method
830.6317 Storage Stability
830.6320 Corrosion Characteristics

The EAM is required before we can register this product; the other two we can conditionally require in our terms of registration.

Please respond and indicate how you intend to address these data gaps.

Regards,

Mindy Ondish

Biologist/Risk Manager | Herbicide Branch | Registration Division
U.S. Environmental Protection Agency | Office of Pesticide Programs
703-605-0723 | www.epa.gov/pesticide-registration

NOTE TO FILE: Data gaps in Product Chemistry review
met via citing studies in data matrix.
These studies were reviewed and
accepted separately from original PC data.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

BARCODE No.: D 441195; **FILE SYMBOL No:** 84009-EO; **PRODUCT NAME:** Quick Acting Weed Killer Concentrate; **DECISION No.** 529313; **PC Code(s):** 103601; 032201
ACTION CODE: R301; **FOOD Use:** No **COMPANY:** Ragan and Massey, Inc.; **MRID No(s):** 492731-01 to -03

DATE OUT. July 26, 2017

SUBJECT: Quick Acting Weed Killer Concentrate

FROM: Indira Gairola / Product Chemistry Team
CITAB / RD (7505P)

TO: Mindy Ondish / Reuben Baris, RM 25
Herbicide Branch / RD (7505P)

Company: Ragan and Massey, Inc.

INTRODUCTION:

The registrant has submitted product chemistry data for the registration of the new end use product Quick Acting Weed Killer Concentrate. In support of the registration application, the registrant is citing (Reg.# 42750-269) 830 series group A & B product chemistry data along with a Basic CSF dated 05/09/17 with MRID No's 492731-01 to -03 claiming similarity. CITAB has been asked to determine acceptability of the aforementioned data submitted and the proposed CSF.

SUMMARY OF FINDINGS:

1. Name of Active Ingredients (s) Diquat dibromide (0.73%). Glyphosate isopropylamine salt (18%).
2. Has the registrant claimed substantial similarity to a registered product?
[x] Yes; [] No; [] NA; if yes give the registration number of the cited product.
EPA Reg.# 42750-269.
3. All of the source materials of the active ingredient are derived from registered sources
[x] Yes [] No
4. All inert ingredients have been screened by CITAB (Inert Team) and found to be approved for the proposed label uses - [x] Yes; [] No

BARCODE No.: D 441195; **FILE SYMBOL No:** 84009-EO; **PRODUCT NAME:** Quick Acting Weed Killer Concentrate; **DECISION No.** 529313; **PC Code(s):** 103601; 032201
ACTION CODE: R301; **FOOD Use:** No **COMPANY:** Ragan and Massey, Inc.
MRID No(s): 492731-01 to --03

Confidential Statement of Formula(s):

☒ Basic - Dated 05/09/17

☐ Re-submitted – Dated

☐ Alternate CSF ☒ NA

Alternate CSF(s) complies with 40CFR§152.43: ☐ Yes; ☐ No; ☒ NA

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2)

☒ Yes- if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)

☒ Yes; ☐ No; if not, explain below

Metallic equivalent: ☐ Yes ☒ NA;

Soluble arsenic: ☐ Yes ☒ NA

Isomeric ratios: ☐ Yes ☒ NA

Acid Equivalent: ☒ Yes ☐ NA contains 1.19lbs glyphosate acid per US gallon

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: ☐ Yes; ☐ No; ☒ NA

Methanol at > 4%: ☐ Yes; ☐ No; ☒ NA

Sodium nitrate/sodium nitrite ☐ Yes; ☐ No; ☒ NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes ☐ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement ☐ Yes ☒ No; if yes explain below:

BARCODE No.: D 441195; **FILE SYMBOL No:** 84009-EO; **PRODUCT NAME:** Quick Acting Weed Killer Concentrate; **DECISION No.** 529313; **PC Code(s):** 103601; 032201
ACTION CODE: R301; **FOOD Use:** No **COMPANY:** Ragan and Massey, Inc.
MRID No(s): 492731-01 to --03

7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos. Cited
			Yes	No		
830.1550	Product Identity & Composition		x		A	492731-02
830.1600	Description of materials used to produce the product		x		A	492731-02
830.1650	Description of formulation process		x		A	492731-02
830.1670	Discussion on the formation of impurities		x		A	492731-02
830.1700	Preliminary analysis				NA	
830.1750	Certified limits (158.350)	Standard certified limits				
		Proposed Limits	x			
		Justification for wider limits				
830.1800	Enforcement analytical method ¹		x		I	492731-01 Applicant has stated validated analytical method will be conducted with storage stability study and will be submitted

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

BARCODE No.: D 441195; **FILE SYMBOL No:** 84009-EO; **PRODUCT NAME:** Quick Acting Weed Killer Concentrate; **DECISION No.** 529313; **PC Code(s):** 103601; 032201
ACTION CODE: R301; **FOOD Use:** No **COMPANY:** Ragan and Massey, Inc.
MRID No(s): 492731-01 to --03

Group B:

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	Clear liquid	A	492731-01
830.6314	Oxidation/ Reduction	Incompatible with 10% KMnO ₄ solution	A	492731-01
830.6315	Flammability	Test substance is a water based product liquid & not flammable	NA	492731-01
830.6316	Explodability	Not composed of explosive components	NA	492731-01
830.7000	pH	4.45 @ 21.2°C	A	492731-01
830.7100	Viscosity	2.2 Centistokes @ 20°C 1.3 Centistokes @ 40°C	A	492731-01
830.7300	Density (units)	<u>1.072g/mL @ 20°C</u>	A	492731-01
830.6317	Storage stability Or Accelerated storage stability	Storage stability test is under way and will be submitted when complete	I	492731-01
830.6320	Corrosion characteristics or Accelerated corrosion characteristics	The test will be conducted along with Storage stability substance	I	492731-01

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress; U = Upgradeable.

BARCODE No.: D 441195; **FILE SYMBOL No:** 84009-EO; **PRODUCT NAME:** Quick Acting Weed Killer Concentrate; **DECISION No.** 529313; **PC Code(s):** 103601; 032201
ACTION CODE: R301; **FOOD Use:** No **COMPANY:** Ragan and Massey, Inc.
MRID No(s): 492731-01 to --03

CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted for the end-use product Quick Acting Weed Killer Concentrate and has concluded that:

A. Substantial similarity to the cited product (Reg. No. 42750-269)

- ☒ Similar
- ☐ Not similar, give reasons:
- ☐ Identical
- ☐ Not identical
- ☐ Not applicable

B 1. Basic CSF (dated 05/09/17)

- ☒ Acceptable
 - ☐ Not Acceptable
 - ☐ Not Applicable
- provide the reasons

2. Alternate

- ☐ Acceptable
- ☐ Not Acceptable If not acceptable give reasons
- ☒ Not Applicable

C Group A Product Chemistry Data

- ☐ Acceptable
- ☒ Acceptable with the exception of Guideline (s) 830.1800 Enforcement analytical method
- ☐ Not acceptable
- ☐ Not required
- ☐ Data cited

D Group B Product chemistry data

- ☐ Acceptable
- ☐ Not acceptable
- ☒ Acceptable with the exception of Guideline (s) 830.6317 storage stability data & 830.6320 corrosion characteristics data
- ☐ Not required
- ☐ Data cited-not acceptable

E. Product Label / Draft Label

Recommendations – [x] Yes

1. Since the product was determined to react with oxidizing agents the registrant is recommended to add the following statement on the label under the heading "Physical and Chemical Hazards"
"Do not mix or allow coming in contact with oxidizing agents. Hazardous Chemical Reaction may occur".



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

BARCODE No.: D 441195; **FILE SYMBOL No.:** 84009-EO (EP. Screen); **PRODUCT NAME:** Quick Acting Weed Killer Concentrate; **DECISION No.:** 529313; **PC Code(s):** 103601; 032201
ACTION CODE: R301; **FOOD Use:** No **COMPANY:** Regan and Massey, Inc.
MRID No(s): 492731-01 to -03

DATE OUT. July 25, 2017

SUBJECT: 45 / 90 day screen results for Quick Acting Weed Killer Concentrate

FROM: Indira Gairola / Product Chemistry Team
CITAB / RD (7505P)

TO: Mindy Ondish / Reuben Baris, RM 25
Herbicide Branch / RD (7505P)

Company: Regan and Massey, Inc

Active Ingredient(s): Diquat dibromide (73%). Glyphosate (18%)

MRID No(s): stated above

CONCLUSION:

Group A - All Data required submitted

Group B: All Data required submitted

CSF: Basic CSF (Dated 05-09-2017) Acceptable
Applicant claimed similarity to EPA Reg.# 42750-69

The subject product Quick Acting Weed Killer Concentrate is similar to EPA Reg.# 42750-69 from product Chemistry point of view

Draft Product Label: Submitted.

Note to PM: If the deficiencies are found in the screen results, please inform the registrant and bring back to author of this report the corrected deficiencies in response to 10-day letter. The corrected information will be attached to the original bean, if the data package is still in CITAB. New Bean is required in case the bean has been closed by CITAB. Thank you.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION

06/JUN/2017

MEMORANDUM

Subject: Name of Pesticide Product: Quick Acting Weed Killer Concentrate
EPA Reg. No./File Symbol: 84009-EO
DP Barcode: D440232
Decision No: 529313
PC Codes: 103601 (glyphosate isopropylamine salt)
032201 (diquat dibromide)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

Through: P.V. Shah, PhD, Chief *PV Shah*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P) *6/6/2017*

To: Reuben Baris, Risk Manager Team 25
Herbicide Branch
Registration Division (7505P)

Applicant: Ragan and Massey, Inc.
101 Ponchatoula Parkway
Ponchatoula, LA 70454

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt</u>
Glyphosate, isopropylamine salt	18.00
Diquat dibromide	0.73
<u>Other ingredients:</u>	<u>81.27</u>
Total:	100.00

ACTION REQUESTED: Similarity determination for 84009-EO, proposed product, and 42750-269, cited product.

BACKGROUND: Ragan and Massey, Inc. has applied for registration of the proposed product, Quick Acting Weed Killer Concentrate, EPA File Symbol 84009-EO, claiming to be substantially similar to Glyphosate + Diquat, EPA Reg. No. 42750-269. Both products contain 18% glyphosate isopropylamine salt and 0.73% diquat dibromide. The submission includes a basic CSF dated May 9, 2017, label, data matrix and company letter.

The registrant is using the selective method of data support to satisfy the acute toxicity data requirements. The data matrix cites acute toxicity studies with MRIDs 454106-02 to -07 and 45461201. A search of the OPP databases shows that MRIDs 454106-02 to -07 are the studies cited to support the registration of the cited product, 42750-269. The Insecticide-Rodenticide Branch /Registration Division assigned an acute toxicity profile to 42750-269 based on these studies in a 2013 memo (Lewis; D416989; EPA File Symbol 42750-269; 30/DEC/2013).

RECOMMENDATIONS:

1. We compared the basic CSFs and labels of the proposed product, 84009-EO, and the cited product, 42750-269, and determined that the two products are substantially similar.
2. The acute toxicity profile for Quick Acting Weed Killer Concentrate, EPA File Symbol 84009-EO, based on 42750-269, is as follows:

acute oral toxicity	IV	cited	MRID 45410602
acute dermal toxicity	IV	cited	MRID 45410603
acute inhalation toxicity	IV	cited	MRID 45410604
primary eye irritation	III	cited	MRID 45410605
primary dermal irritation	IV	cited	MRID 45410606
dermal sensitization	negative	cited	MRID 45410607

3. The basic CSF submitted for 84009-EO must be reviewed and accepted by the product chemists in the Chemistry, Inerts and Toxicology Assessment Branch.

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 084009-EO

PRODUCT NAME: Quick Acting Weed Killer Concentrate

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear protective eyewear, if appropriate. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid:

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

21-Day Screen Completed by
Contractor

21-Day Expires on 5-31-17

Jacket # 84009-EO

MRID# _____

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

MEREDITH LAWS

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 5-10-17 September 2012

Experts In-Processing Signature: B.B. Date 5-12-17 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>84009-EO</u>		EPA Receipt Date: <u>5-10-17</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X		
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A) <u>No Inerts to Review</u>	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent					
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X		
5	a) Selective Method (Fee category experts use)	X				
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of <u>Label</u> (<u>Electronic labels on CD</u> are encouraged and guidance is available)			X		
7	Is the data package consistent with <u>PR Notice 86-5</u>					X
8	<u>Notice of Filing</u> included with petitions					X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation: (Pass)
 - Required forms are complete

Inerts: (N/A)
 - No inerts to review

PRN 11-3: (Pass)
 - No studies submitted

Overall Status: (Pass)
 SM 5/15/17

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, **to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 11, 2017

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-529313
EPA File Symbol or Registration Number: 84009-EO
Product Name: Quick Acting Weed Killer Concentrate
EPA Receipt Date: 10-May-2017
EPA Company Number: 84009
Company Name: RAGAN AND MASSEY, INC.

MS. ARIANNA SHOREY
PYXIS REGULATORY CONSULTING, INC.
RAGAN AND MASSEY, INC.
4110 136TH ST. CT NW
GIG HARBOR, WA 98332-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R301
NEW PRODUCT;IDENTICAL OR SUBSTANTIALLY SIMILAR IN COMPOSITION AND
USE TO A REGISTERED PRODUCT;REGISTERED SOURCE OF ACTIVE
INGREDIENT;SELECTIVE DATA CITATION ONLY FOR DATA ON PRODUCT
CHEMISTRY / ACUTE TOXICITY / PUBLIC HEALTH PEST EFFICACY, WHERE
APPLICANT DOES NOT OWN ALL REQUIRED DATA NOR HAS AUTHORIZATION
LETTER FROM DATA OWNER;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 347-0510.

Sincerely,

A handwritten signature in black ink, appearing to be "vll", is written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{1003458T~

This package includes the following

- ☒ New Registration
- ☐ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 25

Receipt No.

S- 1003458

EPA File Symbol/Reg. No.

84009-EO

Pin-Punch Date:

5/10/2017

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R301

Granted: R301

Amount Due: \$ 1897

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Hope Johnson

Date: 5-11-17

Remarks:

Sim clinic

should this be R300? pm recode if necessary

S: 1003458

Milestone Email: Arianna@PyxisRC.com

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☐ Yes ☒ No

Billable: ☐ Yes ☒ No

Company: 84009 RAGAN AND MASSEY, INC.

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 25

Product #: 84009-EO Product Name: Quick Acting Weed Killer Concentrate

Override#:

☒ Me Too Section3: 42750-269

Me Too Product Name: GLYPHOSATE + DIQUAT

Application Date: 09-May-2017

OPP Rec'd Date: 10-May-2017

Front End Date: 11-May-2017

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Portal submission pkg. #19609. Me-Too registration for an end-use product containing isopropylamine salt of glyphosate and diquat dibromide as the active ingredients.

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content	De
CSF	
Electronic Label	

View/Edit

DOCUMENTUM

Arianna Shorey

From: notification@pay.gov
Sent: Wednesday, May 10, 2017 11:10 AM
To: Arianna Shorey
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 262CE23H
Agency Tracking ID: 75242102072
Transaction Type: Sale
Transaction Date: 05/10/2017 02:09:57 PM EDT

Account Holder Name: Michael Massey

Transaction Amount: \$1,897.00
Card Type: MasterCard
Card Number: *****4777

Registration Number: 84009-xx
Company Name: Ragan and Massey, Inc.
Company Number: 84009
Action Code: R301

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date May 9, 2017		EPA Reg No./File Symbol 84009-XX		Page 1 of 4	
Applicant's/Registrant's Name & Address Ragan and Massey, Inc. 101 Ponchatoula Parkway Ponchatoula, LA 70454		Product Quick Acting Weed Killer Concentrate			
Ingredient: isopropylamine salt of glyphosate; diquat dibromide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA REQUIREMENTS					
830.1550	Product identity and composition	49273101; 49273102	Albaugh, LLC	PER	
830.1600	Description of Materials Used to Produce the Product	49273101; 49273102	Albaugh, LLC	PER	
830.1620	Description of the Production Process				Not required ¹
830.1650	Description of the Formulation Process	49273101; 49273102	Albaugh, LLC	PER	
830.1670	Discussion of Formation of Impurities	49273101; 49273102	Albaugh, LLC	PER	
830.1700	Preliminary Analysis				Not required ²
830.1750	Certified Limits	49273101; 49273102	Albaugh, LLC	PER	
830.1800	Enforcement Analytical Method	49273101; 49348101; 49273102	Albaugh, LLC	PER	
830.6302	Color	49273101; 49273103	Albaugh, LLC	PER	
830.6303	Physical State	49273101; 49273103	Albaugh, LLC	PER	
830.6304	Odor	49273101; 49273103	Albaugh, LLC	PER	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions				Not required ³
Signature <i>Arianna Shorey</i>			Name and Title Arianna Shorey Regulatory Consultant		Date May 9, 2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date May 9, 2017		EPA Reg No./File Symbol 84009-XX		Page 2 of 4	
Applicant's/Registrant's Name & Address Ragan and Massey, Inc. 101 Ponchatoula Parkway Ponchatoula, LA 70454		Product Quick Acting Weed Killer Concentrate			
Ingredient: isopropylamine salt of glyphosate; diquat dibromide					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6314	Oxidation/Reduction: Chemical Incompatibility	49273101; 49273103	Albaugh, LLC	PER	
830.6315	Flammability	49273101	Albaugh, LLC	PER	
830.6316	Explodability	49273101	Albaugh, LLC	PER	
830.6317	Storage Stability	49273101; 49572701	Albaugh, LLC	PER	
830.6319	Miscibility	49273101	Albaugh, LLC	PER	
830.6320	Corrosion Characteristics	49273101; 49572701	Albaugh, LLC	PER	
830.6321	Dielectric Breakdown Voltage	49273101	Albaugh, LLC	PER	
830.7000	pH	49273101; 49273103	Albaugh, LLC	PER	
830.7050	UV/Visible Absorption				Not required ³
830.7100	Viscosity	49273101; 49273103	Albaugh, LLC	PER	
830.7200	Melting Point/Melting Range				Not required ³
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	49273101; 49273103	Albaugh, LLC	PER	
830.7370	Dissociation Constants in Water				Not required ³
830.7520	Particle size, fiber length, and diameter distribution				Not required ³
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required ³
Signature <i>Arianna Shorey</i>			Name and Title Arianna Shorey Regulatory Consultant		Date May 9, 2017



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date May 9, 2017	EPA Reg No./File Symbol 84009-XX	Page 3 of 4
Applicant's/Registrant's Name & Address Ragan and Massey, Inc. 101 Ponchatoula Parkway Ponchatoula, LA 70454	Product Quick Acting Weed Killer Concentrate	

Ingredient: isopropylamine salt of glyphosate; diquat dibromide

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water), Generator Method				Not required ³
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required ³
830.7840	Water Solubility: Column Elution Method, Shake Flask Method				Not required ³
830.7860	Water Solubility: Generator Column Method				Not required ³
830.7950	Vapor Pressure				Not required ³
870.1100	Acute Oral Toxicity: Rat	45410602	Monsanto Company	OLD	
870.1200	Acute Dermal Toxicity: Rat	45410603	Monsanto Company	OLD	
870.1300	Acute Inhalation Toxicity: Rat	45410604; 45461201	Monsanto Company	OLD	
870.2400	Primary Eye Irritation: Rabbit	45410605	Monsanto Company	OLD	
870.2500	Primary Dermal Irritation	45410606	Monsanto Company	OLD	
870.2600	Dermal Sensitization	45410607	Monsanto Company	OLD	
GENERIC DATA REQUIREMENTS					
Quick Acting Weed Killer Concentrate qualifies for Formulator's Exemption for isopropylamine salt of glyphosate and diquat dibromide generic data requirements.					

Signature <i>Arianna Shorey</i>	Name and Title Arianna Shorey Regulatory Consultant	Date May 9, 2017
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Endnotes for Data Matrix for Quick Acting Weed Killer Concentrate

¹ **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.

² **830.1700** – This product does not consist solely of the technical grade active ingredient (TGAi) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.

³ **830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7520, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** – Per OPPTS 830.1000, these data are not required for the registration of an end-use product.



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GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
ARIANNA@PYXISRC.COM

May 9, 2017

ELECTRONIC SUBMISSION

Reuben Baris (PM 25)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Ragan and Massey, Inc. – Quick Acting Weed Killer Concentrate (EPA Reg. No. 84009-XX)
Application for New Pesticide Registration

Dear Mr. Baris,

On behalf of Ragan and Massey, Inc. please find the enclosed application for registration for Quick Acting Weed Killer Concentrate, an end-use product containing isopropylamine salt of glyphosate and diquat dibromide as the active ingredients.

In support of this application, we submit the following documents:

1. Application for Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula (Basic Formulation dated May 9, 2017)
4. Formulators Exemption Statement (EPA Form 8570-27)
5. One (1) copy of the proposed labeling
6. Certification with Respect to Citation of Data (EPA Form 8570-34)
7. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
8. Public File Copy of the Data Matrix (EPA Form 8570-35)
9. Letter of Authorization from Albaugh, LLC
10. Letter of Authorization from Ragan and Massey, Inc.

Ragan and Massey, Inc. believes its product, Quick Acting Weed Killer Concentrate, is substantially similar to a currently registered product (EPA Reg. No. 42750-269) and this application falls under Category R301 (45) since Quick Acting Weed Killer Concentrate Insecticide is a new product, substantially similar in composition and use to a registered product, product chemistry data are being cited with a specific letter of authorization from the data owner and the selective-cite method is being used to support product specific acute toxicity data requirements. In addition, the technical source(s) of active ingredients are based on registered sources of supply and therefore, Quick Acting Weed Killer Concentrate qualifies for Formulators Exemption for isopropylamine salt of glyphosate and diquat dibromide generic data requirements.

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to contact me (T) 253-853-7369 or (E) Arianna@PyxisRC.com if you have any questions or need any additional information.

Sincerely,

A handwritten signature in black ink that reads "Arianna Shorey". The signature is fluid and cursive, with the first name being more prominent.

Arianna Shorey

Enclosures

cc: Ragan and Massey, Inc.

Unites



Environmental Protection Agency

Washington, DC 20460

- ☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number 84009-XX	2. EPA Product Manager R. Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Quick Acting Weed Killer Concentrate	PM# PM 25	
5. Name and Address of Applicant (include ZIP Code) Ragan and Massey, Inc. c/o Pyxis Regulatory Consulting Inc. 4110 136 th St. Ct. NW Gig Harbor, WA 98332	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 42750-269 Product Name Glyphosate + Diquat	

Section - II

- ☐ Amendment – Explain below. ☐ Final printed labels in response to Agency letter dated _____
☐ Resubmission in response to Agency letter dated _____ ☒ "Me Too" Application.
☐ Notification – Explain below. ☐ Other – Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

This application falls under Category R301 (45) as it is a new product substantially similar in composition and use to a registered product. Ragan and Massey, Inc. is submitting a letter of authorization from the data owner for product chemistry data and the selective-cite method of data support is being used to support product specific acute toxicity data requirements. The fee due is \$1,897 and the decision timeline is 4 months plus 21 days. A receipt of PRIA pre-payment from pay.gov is included with this application. Should you have any questions, please contact me at (email) Arianna@PyxisRC.com or (phone) 253-853-7369.

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 qt., 1 gal., 2.5 gal.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Arianna Shorey	Title Regulatory Consultant	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Arianna Shorey	5. Date May. 09, 2017	



United States
Environmental Protection Agency
 Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Ragan and Massey, Inc. 101 Ponchatoula Parkway Ponchatoula, LA 70454	EPA File Symbol/Registration Number 84009-XX <hr/> Product Name Quick Acting Weed Killer Concentrate <hr/> Date of Confidential Statement of Formula (EPA Form 8570-4) May. 09, 2017
--	---

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Isopropylamine salt of glyphosate
 Diquat dibromide

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) of (3).

(3) Indicated by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Isopropylamine salt of glyphosate	Glyphosate 62% MUP	42750-58
Diquat dibromide		
Signature 	Name and Title Arianna Shorey Regulatory Consultant	Date May. 09, 2017

